

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, *et al.*

Plaintiffs,

vs.

Case No. 05CV0329GKF-SAJ

TYSON FOODS, INC., *et al.*

Defendants.

MOTION FOR ADMISSION PRO HAC VICE

Defendants George's, Inc. and George's Farms, Inc. (collectively "George's") by their counsel of record, Bassett Law Firm LLP and The Owens Law Firm, P.C., pursuant to LCvR 83.2(g) and 83.3, hereby move this Court for the admission of Jennifer E. Lloyd, to appear and to practice before this Court *pro hac vice* in this case as out-of-state counsel for George's. In support of this Motion, George's would show the following:

1. The undersigned, Randall E. Rose, is a member of the bar of this Court and is counsel of record for the Defendants, George's, Inc. and George's Farms, Inc., in these proceedings. Randall E. Rose will continue to serve as counsel for Defendants George's in these proceedings.
2. Pursuant to LCvR 83.2(g), attached to this Motion as Exhibit 1 is the completed Request for Admission Pro Hac Vice form of Jennifer E. Lloyd.
3. Jennifer E. Lloyd is a member in good standing of the bar of the State of Arkansas and is admitted to practice in the state and federal courts set forth in numerical paragraph 4 of Exhibit 1 hereto.

4. The proposed admittee understands that, upon admission *pro hac vice*, she shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. Submitted simultaneously with the filing of this Motion is tender of the required \$75.00 fee to the Clerk of this Court.

WHEREFORE, Defendants, George's, Inc. and George's Farms, Inc., respectfully request that the Court grant the out-of-state application of Jennifer E. Lloyd, to be admitted *pro hac vice* in this matter and enter the proposed Order submitted contemporaneously herewith.

Respectfully submitted,

s/ Randall E. Rose

Randall E. Rose (OBA #7753)
The Owens Law Firm, P.C.
234 West 13th Street
Tulsa, OK 74119
(918) 587-0021
(918) 587-6111 Facsimile

and

Gary V. Weeks
James M. Graves (OBA #16657)
Paul E. Thompson, Jr.
Woody Bassett
BASSETT LAW FIRM LLP
221 North College Avenue
P.O. Box 3618
Fayetteville, AR 72702-3618
(479) 521-9996
(479) 521-9600 Facsimile

*Attorneys for Defendants George's Inc.
and George's Farms, Inc.*

CERTIFICATE OF SERVICE

I certify that on the 11th of February, 2008, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

W. A. Drew Edmondson, Attorney General
Kelly Hunter Burch, Assistant Attorney General
J. Trevor Hammons, Assistant Attorney General
Robert D. Singletary, Assistant Attorney General

drew_edmondson@oag.state.ok.us
kelly_burch@oag.state.ok.us
trevor_hammons@oag.state.ok.us
robert_singletary@oag.state.ok

Douglas Allen Wilson
Melvin David Riggs
Richard T. Garren
Sharon K. Weaver
Riggs Abney Neal Turpen Orbison & Lewis

doug_wilson@riggsabney.com,
driggs@riggsabney.com
rgarren@riggsabney.com
sweaver@riggsabney.com

Robert Allen Nance
Dorothy Sharon Gentry
Riggs Abney

rnance@riggsabney.com
sgentry@riggsabney.com

J. Randall Miller
David P. Page
Louis W. Bullock
Miller Keffer & Bullock

rmiller@mkblaw.net
dpage@mkblaw.net
lbullock@mkblaw.net

Elizabeth C. Ward
Frederick C. Baker
William H. Narwold
Motley Rice

lward@motleyrice.com
fbaker@motleyrice.com
bnarwold@motleyrice.com

COUNSEL FOR PLAINTIFFS

Stephen L. Jantzen
Patrick M. Ryan
Paula M. Buchwald
Ryan, Whaley & Coldiron, P.C.

sjantzen@ryanwhaley.com
pryan@ryanwhaley.com
pbuchwald@ryanwhaley.com

Mark D. Hopson
Jay Thomas Jorgensen
Timothy K. Webster
Sidley Austin LLP

mhopson@sidley.com
jjorgensen@sidley.com
twebster@sidley.com

Robert W. George
Michael Bond
Kutak Rock LLP

robert.george@kutakrock.com
michael.bond@kutakrock.com

**COUNSEL FOR TYSON FOODS, INC., TYSON POULTRY, INC., TYSON CHICKEN, INC.;
AND COBB-VANTRESS, INC.**

R. Thomas Lay
Kerr, Irvine, Rhodes & Ables

rtl@kiralaw.com

Jennifer S. Griffin
Lathrop & Gage, L.C.

jgriffin@lathropgage.com

COUNSEL FOR WILLOW BROOK FOODS, INC.

Robert P. Redemann
Lawrence W. Zeringue
David C. Senger

rredemann@pmrlaw.net
lzingue@pmrlaw.net
dsenger@pmrlaw.net

Perrine, McGivern, Redemann, Reid, Berry & Taylor, PLLC

Robert E. Sanders
E. Stephen Williams
Young Williams P.A.

rsanders@youngwilliams.com
steve.williams@youngwilliams.com

COUNSEL FOR CAL-MAINE FOODS, INC. AND CAL-MAINE FARMS, INC.

A. Scott McDaniel
Nicole Longwell

smcdaniel@jpm-law.com
nlongwell@jpm-law.com

COUNSEL FOR PETERSON FARMS, INC.

John R. Elrod
Vicki Bronson
Conner & Winters, P.C.

jelrod@cwlaw.com
vbronson@cwlaw.com

Bruce W. Freeman
D. Richard Funk
Conner & Winters, LLLP

bfreeman@cwlaw.com

COUNSEL FOR SIMMONS FOODS, INC.

John H. Tucker
Colin H. Tucker
Theresa Noble Hill
Rhodes, Hieronymus, Jones, Tucker & Gable

jtuckercourts@rhodesokla.com
chtucker@rhodesokla.com
thillcourts@rhodesokla.com

Terry W. West
The West Law Firm

terry@thewestlawfirm.com

Delmar R. Ehrich
Bruce Jones
Krisann Kleibacker Lee
Dara D. Mann
Faegre & Benson LLP

dehrich@faegre.com
bjones@faegre.com
kklee@faegre.com
dmann@faegre.com

COUNSEL FOR CARGILL, INC. AND CARGILL TURKEY PRODUCTION, LLC

Michael D. Graves
D. Kenyon Williams, Jr.

mgraves@hallestill.com
kwilliams@hallestill.com

COUNSEL FOR POULTRY GROWERS

William B. Federman
Jennifer F. Sherrill
Federman & Sherwood

wfederman@aol.com
jfs@federmanlaw.com

Teresa Marks
Charles Moulton
Office of the Attorney General

teresa.marks@arkansasag.gov
charles.moulton@arkansasag.gov

**COUNSEL FOR THE PLAINTIFFS OF ARKANSAS AND THE ARKANSAS NATURAL
RESOURCES COMMISSION**

I also hereby certify that I served the foregoing document by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

C. Miles Tolbert
Secretary of the Environment
Plaintiffs of Oklahoma
3800 North Classen
Oklahoma City, OK 73118
COUNSEL FOR PLAINTIFFS

Thomas C. Green
Sidley Austin Brown & Wood LLP
1501 K Street NW
Washington, DC 20005
**COUNSEL FOR TYSON FOODS, INC.,
TYSON POULTRY, INC., TYSON
CHICKEN, INC.; AND COBB-VANTRESS,
INC.**

s/ Randall E. Rose
Randall E. Rose